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DEC 20 2001

NORTHERN DISTRICT OF ILLINOIS  
DIVISION

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

JONATHAN D. LIGHTFOOT

(Name of the plaintiff or plaintiffs)

v.

City Colleges of Chicago

(Name of the defendant or defendants)

JUDGE NORGLITZ

DOCKETED

DEC 21 2001

CIVIL ACTION

NO. **01C 9746**  
(Case number will be supplied by the assignment clerk)

MAGISTRATE JUDGE NOLAN

COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.
2. The plaintiff is JONATHAN D. LIGHTFOOT of  
the county of COOK in the state of ILLINOIS.
3. The defendant is CITY COLLEGES OF CHICAGO, who  
resides at (street address) 226 W. JACKSON BLVD.  
(city) CHICAGO (county) COOK (state) IL (ZIP) 60606  
(Defendant's telephone number) (312)-553-2900

4) The plaintiff sought employment or was employed by the defendant at

(street address) 226 W. Jackson Blvd  
(city) Chicago (county) Cook (state) IL (ZIP code) 60606

5. The plaintiff [check one box]

- (a) ☐ was denied employment by the defendant.  
(b) ☐ was hired and is still employed by the defendant.  
(c) ☒ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about,  
(month) January, (day) 3, (year) 2000.

7. (a) The plaintiff [check one box] ☐ *has not* filed a charge or charges against the defendant  
☒ *has*  
asserting the acts of discrimination indicated in this complaint with any of the following  
government agencies:

- (i) ☒ the United States Equal Employment Opportunity Commission on or about  
(month) April (day) 4 (year) 2000.  
(ii) ☒ the Illinois Department of Human Rights on or about  
(month) April (day) 4 (year) 2000.

(b) If charges *were* filed with an agency indicated above, a copy of the charge is  
attached. ☒ YES ☐ NO

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department  
of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason  
to believe that this policy was not followed in this case.

8. (a) ☐ the United States Equal Employment Opportunity Commission has not issued a  
*Notice of Right to Sue*.

- (b) ☒ the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month) September (day) 29 (year) 2001 a copy of which *Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [check all that apply]

- (a) ☐ Age (Age Discrimination Employment Act).  
(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).  
(c) ☐ Disability (Americans with Disabilities Act)  
(d) ☐ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).  
(e) ☐ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).  
(f) ☐ Religion (Title VII of the Civil Rights Act of 1964)  
(g) ☒ Sex (Title VII of the Civil Rights Act of 1964)

10. The plaintiff is suing the defendant, a state or local government agency, for discrimination on the basis of race, color, or national origin (42 U.S.C. §1983).

☐ YES ☒ NO

11. Jurisdiction over the statutory violation alleged is conferred as follows: over Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); over 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; over the A.D.E.A. by 42 U.S.C. §12117.

12. The defendant [check all that apply]

- (a) ☐ failed to hire the plaintiff.  
(b) ☒ terminated the plaintiff's employment.  
(c) ☐ failed to promote the plaintiff.  
(d) ☐ failed to reasonably accommodate the plaintiff's religion.  
(e) ☐ failed to reasonably accommodate the plaintiff's disabilities.

(f) ☐ other (specify): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

13. The facts supporting the plaintiff's claim of discrimination are as follows:

I was informed on Jan. 3, 2000 that my position as Assoc. Vice Chancellor, Academic Support & Student Services was being eliminated. I was offered contract employment with the Office of Information Technology at a much lower rate of pay. I was terminated within days of declining the offer (3/10/00). A female was subsequently hired in my same position.

14. [AGE DISCRIMINATION ONLY] Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff [check all that apply]

- (a) ☐ Direct the defendant to hire the plaintiff.
- (b) ☒ Direct the defendant to re-employ the plaintiff.
- (c) ☐ Direct the defendant to promote the plaintiff.
- (d) ☐ Find that the defendant failed to reasonably accommodate the plaintiff's religion.
- (e) ☐ Find that the defendant failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ Direct the defendant to (specify): Compensate plaintiff in the amount of one (1) year's salary \$71,000.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.

(h) ☒ Grant such other relief as the Court may find appropriate.

(Plaintiff's signature)

(Plaintiff's name)

(Plaintiff's street address)

Jonathan D. Lightfoot  
JONATHAN D. LIGHTFOOT  
6118 N. Hermitage #C

(City) Chicago (State) IL (ZIP) 60660

(Plaintiff's telephone number) (773) - 381-2766

CHARGE OF DISCRIMINATION		AGENCY <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	CHARGE NUMBER  2000CF2222
This form is affected by the Privacy Act of 1974. See Privacy act statement before completing this form.			
Illinois Department of Human Rights and EEOC State or local Agency, if any			
NAME (Indicate Mr., Ms., Mrs.) Jonathan D. Lightfoot		HOME TELEPHONE (Include Area Code) 773-381-2766	
STREET ADDRESS 6118 N. Hermitage, Unit C Chicago, IL 60660		CITY, STATE AND ZIP CODE DATE OF BIRTH	
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one, list below).			
NAME City Colleges of Chicago		NUMBER OF EMPLOYEES, MEMBERS 15+	TELEPHONE (Include Area Code) 312-553-2900
STREET ADDRESS 226 W. Jackson Blvd.		CITY, STATE AND ZIP CODE Chicago, IL 60606	COUNTY Cook
NAME		TELEPHONE (Include Area Code)	
STREET ADDRESS		CITY, STATE AND ZIP CODE	
COUNTY			
CAUSE OF DISCRIMINATION BASED ON (check appropriate box(es)) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER			DATE DISCRIMINATION TOOK PLACE EARLIEST (ADE/FEPA)    LATEST (ALL) 1/3/00 <input type="checkbox"/> CONTINUING ACTION
THE PARTICULARS ARE (If additional space is needed, attach extra sheets)			
I. A. ISSUE/BASIS DISCHARGE ON JANUARY 3, 2000 DUE TO MY SEX, MALE  B. PRIMA FACIE ALLEGATIONS 1. I am a male. 2. My performance as Associate Vice-Chancellor was excellent. 3. On January 3, 2000, I was told by Diedre Lewis, Vice-Chancellor (female), that my position was being eliminated. I was offered another position in the Office of Information Technology at a much lower pay rate, which I declined. 4. Valerie Roberson (female) was asked to replace me.			
WVE/RCG/abm			
<input checked="" type="checkbox"/> I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone Number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY Public for State and Local Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
I declare under penalty of perjury that the foregoing is true and correct.		SIGNATURE OF COMPLAINANT DATE	
OFFICIAL SEAL YOLANDA GLYNIS GODWIN NOTARY PUBLIC, STATE OF ILLINOIS MY COMMISSION EXPIRES 06/21/03		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (day, month, and year) 4.4.00	

CHARGE OF DISCRIMINATION		AGENCY	CHARGE NUMBER
This form is affected by the Privacy Act of 1974; See Privacy act statement before completing this form.		<input checked="" type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	2000CF2222
Illinois Department of Human Rights		and EEOC	
State or local Agency, if any			
NAME (Indicate Mr., Ms., Mrs.)		HOME TELEPHONE (Include Area Code)	
Jonathan D. Lightfoot		773-381-2766	
STREET ADDRESS		CITY, STATE AND ZIP CODE	
6118 N. Hermitage, Unit C Chicago, IL 60660			
DATE OF BIRTH			
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one, list below).			
NAME		NUMBER OF EMPLOYEES, MEMBERS	TELEPHONE (Include Area Code)
City Colleges of Chicago		15+	312-553-2900
STREET ADDRESS		CITY, STATE AND ZIP CODE	
226 W. Jackson Blvd.		Chicago, IL 60606	
COUNTY			
Cook			
NAME		TELEPHONE (Include Area Code)	
STREET ADDRESS		CITY, STATE AND ZIP CODE	
COUNTY			
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))			DATE DISCRIMINATION TOOK PLACE
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER			EARLIEST (ADEA/EPA)    LATEST (ALL)  1/3/00
			<input type="checkbox"/> CONTINUING ACTION
THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s))			
AMENDMENT #1			
I. A. ISSUE/BASIS DISCHARGE ON JANUARY 3, 2000 DUE TO MY SEX, MALE  B. PRIMA FACIE ALLEGATIONS  1. I am a male.  2. My performance as Associate Vice-Chancellor was excellent.  3. On January 3, 2000, I was told by Diedre Lewis, Vice-Chancellor (female), that my position was being eliminated. I was offered another position in the Office of Information Technology at a much lower pay rate, which I declined.  4. Valerie Roberson (female) was asked to replace me. The individual that actually replaced me was Cynthia Armster (female).			
WVE/RCG/abm			
<input checked="" type="checkbox"/> I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone Number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY (when necessary for State and Local Requirements) I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief	
I declare under penalty of perjury that the foregoing is true and correct.		SIGNATURE OF COMPLAINANT	
<b>"OFFICIAL SEAL"</b> Krystal I. Rogers Notary Public, State of Illinois My Commission Expires July 9, 2002		DATE	
		4-26-00 SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year)	